

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CITY OF LAKELAND EMPLOYEES	)	Case No. 1:10-cv-06016
PENSION PLAN, Individually and on Behalf	)	
of All Others Similarly Situated,	)	<u>CLASS ACTION</u>
	)	
Plaintiff,	)	Assigned to: Judge John J. Tharp, Jr.
	)	
vs.	)	
	)	
BAXTER INTERNATIONAL INC., et al.,	)	
	)	
Defendants.	)	
	)	
	)	

---

**LEAD PLAINTIFF’S UNOPPOSED MOTION TO CONTINUE DISCOVERY  
DEADLINE FOR DEPOSITION OF DEFENDANT ROBERT M. DAVIS**

Lead Plaintiff National Elevator Industry Pension Fund (“Plaintiff”) files this unopposed motion and respectfully requests that the Court enter an Order continuing the discovery deadline solely for the deposition of Defendant Robert M. Davis. In support thereof, Plaintiff states:

1. On October 7, 2014, the Court entered an Order (“October 7 Order”) granting Plaintiff’s unopposed motion to continue the discovery deadline for completing three fact discovery depositions. Pursuant to the October 7 Order, fact discovery is currently set to conclude on February 27, 2015. [Dkt. No. 229].

2. The parties have conferred and agreed to continue the deposition of Defendant Robert M. Davis, one of the three deponents contemplated under the October 7 Order, until the mutually

agreeable dates of March 5-6, 2015, just six days after expiration of the current fact discovery deadline.

3. In light of the foregoing, Plaintiff respectfully requests that the deadline to complete the deposition of Defendant Robert M. Davis be extended until March 6, 2015.

4. In compliance with Local Rule 37.2, counsel for the parties conferred with each other by electronic mail on November 14, 2014. Counsel for Plaintiff advises that Defendants do not oppose the relief requested herein.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that the Court enter an Order extending the deadline to complete the deposition of Defendant Robert M. Davis until March 6, 2015, and for such other and further relief as this Court deems just and proper

DATED: November 14, 2014

MILLER LAW LLC  
MARVIN A. MILLER  
MATTHEW E. VAN TINE  
LORI A. FANNING

*/s/ Lori A. Fanning*

---

LORI A. FANNING

115 S. LaSalle Street, Suite 2910  
Chicago, IL 60603  
Telephone: 312/332-3400  
312/676-2676 (fax)

*Liaison Counsel for Lead Plaintiff*

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DAVID J. GEORGE  
ROBERT J. ROBBINS  
BAILIE L. HEIKKINEN  
KATHLEEN B. DOUGLAS  
HOLLY W. KIMMEL  
JANINE D. ARNO  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561/750-3000  
561/750-3364 (fax)

ROBBINS GELLER RUDMAN  
& DOWD LLP  
TOR GRONBORG  
JASON A. FORGE  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

*Lead Counsel for Lead Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 14, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this notice as service of this document by electronic means.

/s/ Lori A. Fanning

LORI A. FANNING